



Federal Regulatory Affairs

2300 N St. NW, Suite 710 Washington DC 20037

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February 23, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On February 21, 2012, Ken Mason, Vice President, Government and Regulatory Affairs, Frontier Communications, and the undersigned met with Angie Kronenberg, Wireline Legal Advisor to Commissioner Clyburn.

The participants discussed the Petition for Clarification that Frontier filed with Windstream,¹ which requested that the Commission clarify that it did not intend to flash cut existing originating intrastate access rates for PSTN→VoIP access traffic to the interstate rate level. Frontier explained that the effect of such an action could have significant revenue impacts on an ongoing basis as there is no originating access transition currently in place that would harmonize originating intrastate or interstate rates. The discussion was consistent with points made in the *Petition*.

Also, Frontier also expressed its concerns with the recently filed Petitions for Limited Waiver of the Commission's new call signaling rules designed to prevent phantom traffic.² Frontier emphasized that while there are certain instances where it may be technically infeasible to comply with the call signaling rules it is important that the Commission does not make the classes of excepted traffic so great as to render its new rules meaningless.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

¹ See Petition for Reconsideration and/or Clarification filed by Frontier Communications Corp. and Windstream Communications, Inc. ("*Petition*"), WC Docket 10-90, et al., at 21-29 (filed Dec. 29, 2011).

² See AT&T Inc., Petition for Limited Waiver, WC Dkt. Nos. 10-90 et al. (filed Dec. 29, 2011); CenturyLink Inc., Petition for Limited Waiver, WC Dkt. Nos. 10-90 et al. (filed Jan. 23, 2012); Verizon, Petition for Limited Waiver, WC Dkt. Nos. 10-90 et al. (filed Feb. 10, 2012).

Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in blue ink, reading "Michael Saperstein, Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.
Director of Federal Regulatory Affairs
Frontier Communications
(202) 223-6807

cc: Angie Kronenberg